



U.S. Environmental Protection Agency
Region 6
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

RISK MANAGEMENT PROGRAM INSPECTION FINDINGS, ALLEGED VIOLATIONS AND PROPOSED PENALTY SHEET

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with Section 112(r)(7) accidental release prevention requirements of the Clean Air Act, as amended 1990. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical storage, handling, processing, and use; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

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|---|--|--|
| Facility Name: KMTEx | <input checked="" type="checkbox"/> Private # of Employees: 20 Contractors/Others: | <input type="checkbox"/> Government/Municipal Population Served: 0 |
| Mailing Address: PO Box 1427 Port Arthur, TX 77640-1427 | Inspection Start Date and Time: January 25, 2007 at 9:00 AM | |
| Physical Address: 2450 South Gulfway Drive Port Arthur, TX 77641 | Inspection End Date and Time: January 25, 2007 at 2:00 PM | |
| E-Mail Address: davids@kmtex.com | | |
| Responsible Official, Title, Phone Number: Mr. David Spacek, Plant Manager, (409) 985-4200 | EPA Facility ID#: 1000 0018 0065 | |
| Facility Representative(s), Title(s), Phone Number(s): Mr. Tracy Thomassee, Safety/Logistics Mgr, Mr. Jason Brack, Process Engineer | Inspector Name(s), Title(s), Phone Number(s): Bill Andrews, RMP Inspector (214) 665-6493 | |
| Inspection Report Reviewer Signature | Date | Inspector Signature |
| | | Date |

Inspection Findings

| | | | |
|---|---|---------------------------------------|----------------------------|
| IS FACILITY SUBJECT TO RMP REGULATION (40 CFR 68)? | | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| DID FACILITY SUBMIT (AND UPDATE) AN RMP AS PROVIDED IN 68.150 TO 68.185? | | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| DATE INITIAL RMP FILED WITH EPA: 9/26/2002 | | DATE OF LATEST RMP: 8/26/2003 | |
| 1) PROCESS/NAICS CODE: All Other Basic Organic Chemical Manufacturing/325199 | PROGRAM LEVEL: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> | | |
| REGULATED SUBSTANCE: Vinyl acetate monomer | MAXIMUM QUANTITY IN PROCESS: 2500000 (lbs) | | |
| 2) PROCESS/NAICS CODE: | PROGRAM LEVEL: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> | | |
| REGULATED SUBSTANCE: | MAXIMUM QUANTITY IN PROCESS: (lbs) | | |
| 3) PROCESS/NAICS CODE: | PROGRAM LEVEL: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> | | |
| REGULATED SUBSTANCE: | MAXIMUM QUANTITY IN PROCESS: (lbs) | | |
| 4) PROCESS/NAICS CODE: | PROGRAM LEVEL: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> | | |
| REGULATED SUBSTANCE: | MAXIMUM QUANTITY IN PROCESS: (lbs) | | |
| 5) PROCESS/NAICS CODE: | PROGRAM LEVEL: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> | | |
| REGULATED SUBSTANCE: | MAXIMUM QUANTITY IN PROCESS: (lbs) | | |
| DID THE FACILITY CORRECTLY ASSIGN PROGRAM LEVELS TO PROCESSES? | | <input type="checkbox"/> Y | <input type="checkbox"/> N |

ATTACHED CHECKLIST(S):

☐ PROGRAM LEVEL 1 CHECKLIST

☐ PROGRAM LEVEL 2 CHECKLIST

☒ PROGRAM LEVEL 3 CHECKLIST

OTHER ATTACHMENTS:

COMMENTS:

ALSO ATTENDING: BILL LASCO, ENVIOMENTAL MGR FROM LOCAL AFFILIATE.